

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	*	CHAPTER 13
MARVIN .A BROOKS	*	BANKRUPTCY NO. 19-15914
	*	
Debtors		

DEBTORS' OBJECTION TO CERTIFICATE OF DEFAULT

Debtor, Marvin A. Brooks, by and through his attorney, Kenneth G. Harrison, Esquire, respectfully represents the following:

1. Mortgage company, Flagstar Bank, filed a Certification of Default concerning a Stipulation.

2. Mortgage company claims that Debtor did not pay all of the mortgage statements.


3. Debtor objects to the Certification of Default on the following grounds:

A. Debtor has made payments during the time periods of alleged non-payment by the mortgage company. See Exhibit "A".

B. Debtor's attorney attempted to fax proof of payments to Mortgage company's attorney, as per the Notice of Default, but the fax machine was always busy.

WHEREFORE, Debtor respectfully requests that this Honorable Court dismiss this Certification of Default.

Respectfully submitted,



Kenneth G. Harrison, Esquire
Five Neshaminy Interplex Suite 115
Trevose, PA 19053



020
CHESTNUT HILL (661)
8340 GERMANTOWN AVENUE
PHILADELPHIA, PA, 19118
Cashbox 09

Business Date OCT 25, 2021
Calendar Date OCT 25, 2021

Purchase 11:33
Transaction Number 00164
Account Type Official Check
Account Number XXXXXXXXX
Document Number 4941947
Transaction Amount \$ 3,426.00
Funded by Check \$ 3,426.00

Payee:
FLAGSTAR
Remitter:
MARVIN BROOKS

This deposit or payment is accepted subject to verification and to the rules and regulations of this bank. Deposits may not be available for immediate withdrawal. Receipt should be held until verified with your statement.

FOR MORE INFORMATION AND EXAMPLES OF WHEN
DEPOSITS BECOME AVAILABLE, GO TO
WWW.PNC.COM/BANKWISELY



060
FLEMINGTON (035)
240 US HIGHWAY 202,31 N
FLEMINGTON, NJ, 08822
Cashbox 07

Business Date AUG 27, 2021
Calendar Date AUG 27, 2021

Purchase 12:50
Transaction Number 00136
Account Type Official Check
Account Number XXXXXXXXX
Document Number 03870875
Transaction Amount \$ 1,713.00
Funded by Check \$ 1,713.00

Payee:
FLAGSTAR BANK
Remitter:
MARVIN BROOKS

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060
FLEMINGTON (035)
240 US HIGHWAY 202 31 N
FLEMINGTON, NJ, 08822
Cashbox 02

Business Date APR 29, 2022
Calendar Date APR 29, 2022

Purchase 16:55
Transaction Number 00220
Account Type Official Check
Account Number XXXXXXXXX
Document Number 03925003
Transaction Amount \$ 1,713.00
Funded by Check \$ 1,713.00

Payee:
FLAGSTAR BANK
Remitter:



020
1600 MARKET STREET (670)
1600 MARKET STREET
PHILADELPHIA, PA, 19103
Cashbox 11

Business Date APR 18, 2022
Calendar Date APR 18, 2022

Transaction Number 00142
Account Type Official Check
Account Number XXXXXXXXX
Document Number 5052852
Transaction Amount \$ 1,713.00
Funded by Check \$ 1,713.00

Payee:
FLAGSTAR BANK
Remitter:



060
FLEMINGTON (035)
240 ROUTE 202
FLEMINGTON, NJ, 08822
Cashbox 03

Business Date JUN 4, 2021
Calendar Date JUN 4, 2021

Purchase 16:55
Transaction Number 00086
Account Type Official Check
Account Number XXXXXXXXX
Document Number 038*5160
Transaction Amount \$ 1,713.00
Funded by Check \$ 1,713.00

Payee:
FLAG STAR BANK
Remitter:
MARVIN BROOKS

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060
FLEMINGTON (035)
240 ROUTE 202
FLEMINGTON, NJ, 08822
Cashbox 04

Business Date JUN 25, 2021
Calendar Date JUN 25, 2021

Purchase 16:54
Transaction Number 00266
Account Type Official Check
Account Number XXXXXXXXX
Document Number 03825329
Transaction Amount \$ 1,713.00
Funded by Check \$ 1,723.00
Fee Amount \$ 10.00

Payee:
FLAG STAR BANK
Remitter:
MARVIN BROOKS

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	*	
Debtor	*	

ORDER

AND NOW, this day of , 2022, upon
consideration of Debtor's Objection to Certification of Default,
it is hereby ORDERED and DECREED that;
said Certification is DENIED

BY THE COURT:

J.

Kenneth G. Harrison, Esquire
Five Neshaminy Interplex Suite 115
Trevose, PA 19053

KML Law Group, P.C.
701 Market Street
Suite 5000
Philadelphia, Pa 19106

Kenneth E. West, Esquire (Trustee)
1234 Market Street
Suite 1813
Philadelphia, PA 19107